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12 *Counsel for Defendants*

13 **IN THE UNITED STATES DISTRICT COURT**

14 **FOR THE DISTRICT OF NEVADA**

15 ROBERT SINGER,

16 Plaintiff,

17 v.

18 C. R. BARD, INC.; BARD PERIPHERAL  
19 VASCULAR, INCORPORATED,

20 Defendants.  
21

CASE NO. 2:19-cv-01579-JCM-BNW

22 **STIPULATION AND ORDER TO EXTEND DISCOVERY**

23 **AND PRE-TRIAL DEADLINES**

24 Comes now, Defendants C. R. Bard, Inc. and Bard Peripheral Vascular, Inc. ("Bard"  
25 or "Defendants") and Plaintiff Robert Singer ("Plaintiff"), by and through their undersigned  
26 counsel of record, pursuant to LR IA 6-2, and hereby stipulate that all existing discovery and  
27 pre-trial deadlines are extended by 90 days. This stipulation is entered into as a result of

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1 complications and difficulties related to the current national emergency caused by the spread  
2 of COVID-19.

3 For the foregoing reasons, the parties stipulate and request that this Court modify the  
4 Stipulated Discovery Plan and Scheduling Order, Dkt. 20, as follows:

5 PROPOSED DATE	DEADLINE
6 November 22, 2019	The Parties shall exchange Rule 26(a) Initial Disclosures. 7 The Plaintiff shall produce a list of medical providers for the 8 period of time from ten years before placement of the Bard filter 9 at issue in the case to the present, and shall sign standard medical 10 and other records release authorizations agreed upon by the 11 parties.
11 November 22, 2019	The Parties shall join other parties and amend the pleadings.
12 December 6, 2019	Plaintiff shall produce the completed Plaintiff Fact Sheet and 13 related information utilized in the <i>In re: C. R. Bard, Inc. IVC</i> 14 <i>Filter MDL</i> , attached as <b>Exhibit A</b> . The parties agree that the 15 terms incorporated into the Plaintiff Fact Sheet form adopted in 16 MDL 2641 and Federal Rules of Civil Procedure 26, 33, 34, and 17 37 shall apply to the completion and supplementation of the 18 Plaintiff Fact Sheet. The parties agree that any additional case- 19 specific written discovery such as Interrogatories or Request for 20 Production will be limited and targeted to the specific facts of this 21 case.
22 January 10, 2020	Defendants shall produce the Defendant's Fact Sheet and related 23 information utilized in the <i>In re: C. R. Bard, Inc. IVC Filter MDL</i> , 24 attached as <b>Exhibit B</b> . The parties agree that the terms 25 incorporated into the Defendant Fact Sheet form adopted in MDL 26 2641 and Federal Rules of Civil Procedure 26, 33, 34, and 37 27 shall apply to the completion and supplementation of the Defense 28 Fact Sheet. The parties agree that any additional case-specific written discovery such as Interrogatories or Request for Production will be limited and targeted to the specific facts of this case.
October 8, 2020	Case-specific fact discovery closes.
October 22, 2020	The Plaintiff shall produce case-specific expert reports.
November 26, 2020	The Defendants shall produce case-specific expert reports.

PROPOSED DATE	DEADLINE
December 17, 2020	The Plaintiff shall produce any case-specific rebuttal expert reports.
January 11, 2021	The Defendants shall produce any rebuttal expert reports.
January 25, 2021	Deadline to depose the Plaintiff's case-specific experts about their case-specific reports.
March 1, 2021	Deadline to depose the defendants' case-specific experts about their case-specific reports.
April 12, 2021	Deadline to file Daubert motions and other dispositive motions.

**IT IS SO STIPULATED.**

Dated this 2nd day of April 2020.

WETHERALL GROUP, LTD.

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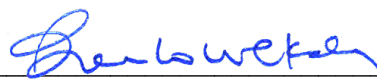
Dated this 3rd day of April 2020.

Dated this 2nd day of April 2020.

GREENBERG TRAURIG, LLP

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**IT IS SO ORDERED.**

  
 BREND A WEKSLER  
 UNITED STATES MAGISTRATE JUDGE

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*/s/ Evelyn Escobar-Gaddi*  
An employee of GREENBERG TRAURIG, LLP